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Attorneys for Defendant The Guida-Seibert Dairy Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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TIFFANEE GOULD, individually and on : Case No. 1:22-cv-01861-NLH-AMD
behalf of her minor son, A.J., *et al.*, :
:
Plaintiffs, : **CERTIFICATION OF BENJAMIN P.**
v. : **ABEL IN SUPPORT OF MOTION**
THE GUIDA-SEIBERT DAIRY COMPANY, : **FOR ADMISSION PRO HAC VICE**
et al., :
:
Defendants. :
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I, BENJAMIN P. ABEL, certify as follows pursuant to Local Civil Rule 101.1(c):

1. I am an Associate with the law firm of McGuireWoods LLP, attorneys for Defendant The Guida-Seibert Dairy Company (“Defendant”), and my principal office is located at 323 Second Street SE, Suite 700, Charlottesville, Virginia 22902, telephone (434) 977-2500. I am fully familiar with the facts and circumstances surrounding this litigation, and I submit this declaration in support of Defendant’s application for an Order admitting me as counsel *pro hac vice* in this action and in any related mediation or arbitration.

2. I have been admitted to practice before the following courts in the years indicated:

- Clerk’s Office
Supreme Court of Virginia
100 North Ninth Street
Richmond, Virginia 23219
(804) 786-6455
Admitted on December 9, 2015

- Clerk's Office
U.S. District Court for the Eastern District of Virginia
Spottswood W. Robinson III and Robert R. Merhige, Jr., Federal
Courthouse
701 East Broad Street
Richmond, VA 23219
(804) 916-2200
Admitted on March 2, 2016
- Clerk's Office
U.S. District Court for the Western District of Virginia
210 Franklin Road S.W., Suite 540
Roanoke, VA 24011
(540) 857-5100
Admitted on January 27, 2016

3. I am currently, and continuously have been since the dates indicated above, a member in good standing in each of those jurisdictions. To my knowledge, no charges have been brought against me regarding my practice in those jurisdictions, and I am not suspended or disbarred.

4. I have never been convicted of a felony or a crime, nor have I been censured, suspended, disciplined or disbarred by any court, nor do I have any disciplinary or contempt proceedings involving me pending before any court, nor have I been denied admission to any court during the last five years.

5. I agree to abide by the ethical standards governing the practice of law in this Court pursuant to the New Jersey State Lawyer's Code of Professional Responsibility, and submit to this Court's Local Rules. I will comply with all provisions of Local Civil Rule 101.1(c).

6. Pursuant to the rules of this Court, all papers filed on behalf of Defendant will be filed by local counsel Philip A. Goldstein, or another attorney admitted in the State of New Jersey.

7. All fees to the Clerk of the Court and the New Jersey Lawyers' Fund for Client Protection shall be timely made.

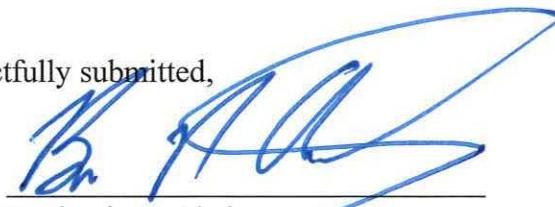
8. The purpose of this application is to make it possible for me to represent Defendant, which has sought my advice and assistance with respect to this litigation.

9. For the foregoing reasons, I respectfully request this Court admit me *pro hac vice* in the above-entitled action.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: Charlottesville, Virginia
May 31, 2022

Respectfully submitted,



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